



5341 Limestone Road, Wilmington, Delaware 19808  
www.5aday.org Ph: 302.235.2329 Fax: 302.235.5555

*Leading THE WAY to healthy eating*

May 22, 2006

Docket Clerk, Fruit and Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue, SW.  
Stop 0243  
Washington, DC 20250-0243  
Attn: Trista Etzig

[sblockgrants@usda.gov](mailto:sblockgrants@usda.gov)

Dear Ms. Etzig:

On behalf of the Produce for Better Health Foundation (PBH), I am providing comments in response to the April 20, 2006 proposed rule: *Specialty Crop Block Grant Program; Notice of Request for Approval of a New Information Collection*.

This rulemaking is an important step in assuring that specialty crop block grant funds are used appropriately by states to enhance the competitiveness of specialty crops with the ultimate goal of helping consumers improve their health by eating more fruits and vegetables. While more than half of Americans know they need to eat at least five daily servings of fruits and vegetables, just one in five achieves that minimum, despite years of effort by countless government, nonprofit, and commercial organizations.<sup>i ii</sup> The most recent Dietary Guidelines for Americans, issued in 2005, included a significant increase in the recommended servings of fruits and vegetables: 5 to 13 servings daily are now recommended, up from 5 to 9 servings recommended in 2000.<sup>iii</sup> Most Americans consume about 3.6 servings of health-promoting fruits and vegetables daily.<sup>iv</sup>

Specialty Crop grants to states are a critical component of an overall approach to helping Americans consume more health promoting fruits and vegetables, while at the same time helping the specialty crop industry be more competitive. We urge USDA to assure that state departments of agriculture be permitted to collaborate with other partners in developing their state plans indicating how the funds will be used to enhance the competitiveness of specialty crops.





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### **PBH and Specialty Crop Funding: 2002-2005**

PBH has a proven track record in helping states develop programs and initiatives to promote specialty crops and worked closely with Florida, Arizona, and California from 2002 through 2005 to develop and launch the *5 A Day The Color Way* initiative – an innovative, multi-faceted campaign that urges consumers to eat a colorful variety of fruits and vegetables – at least 1 serving daily from each of the 5 color groups (blue/purple, green, white, yellow/orange, and red). *5 A Day The Color Way*'s development and implementation were made possible with specialty crop funds from the three states that provided for message and materials development, consumer testing, industry and media launch, supermarket and retailer introduction, and broad state-wide implementation.

Of particular interest is the return on investment for USDA as a result of PBH's efforts to promote fruits and vegetables. Specifically, for the duration of the specialty crop grants (2002-2005), more than \$134 million in leveraged funds were spent on implementation of the Color Way campaign, representing a nearly 30-fold return on the total \$4,583,250 in specialty crop funds invested in PBH. Other notable highlights include:

- an increase in grocery purchases among households with high awareness of the Color Way campaign;
- company buy-in with 360 companies promoting Color Way;
- 8.5 billion media impressions for the Color Way; and
- partnership with Sesame Workshop as part of the "Healthy Habits" series.

The attached report: *5 A Day The Color Way Campaign: Specialty Crop Grants Results and Notable Highlights* provides a detailed description of PBH's activities.<sup>v</sup>

### **Outcome Measures**

The proposed rule specifically requested comments on how to incorporate outcome measures into state plans for specialty crop grants. PBH urges USDA to review the report referenced above to look at the numerous ways PBH documented success and developed outcome measures. Given PBH's vast network of members – growers, shippers, commodity boards, large and small retailers, restaurants, and public health operators – we are well-suited to promote specialty crops in a variety of settings, leveraging the resources from our partners, with proven success. We welcome the opportunity to meet with USDA officials to discuss outcome measures and provide insight based on our successes with specialty crop funded initiatives.





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### **“Fresh” Priority**

While PBH understands USDA’s intent to assure that a variety of specialty crop sectors be eligible for block grant funding, the language as currently drafted may be interpreted to give certain specialty crops preference over others. Therefore, PBH urges USDA to ensure that block grants be eligible to all specialty crops as defined in the law and to not give priority to one sector of specialty crops over another.

On behalf of PBH, thank you for considering these comments. PBH urges USDA to issue a final rule that is consistent with the authorizing legislation and that allows states to partner with organizations – like PBH – that have a proven track record in leveraging resources and we look forward to working with USDA and states on developing successful initiatives to promote specialty crops.

Sincerely,

A handwritten signature in black ink that reads 'Elizabeth Pivonka'.

Elizabeth Pivonka, PhD, RD  
President, Produce for Better Health Foundation

*About Produce for Better Health Foundation: Produce for Better Health Foundation is a nonprofit organization whose mission is to lead the way to achieving increased daily consumption of fruits and vegetables by leveraging private industry resources, leveraging public sector resources, influencing policy makers, motivating key consumer influencers, and promoting fruits and vegetables directly to consumers. The foundation is chair and member of the National 5 A Day Partnership, consisting of government agencies, nonprofit organizations, and industry working in collaboration to expand 5 A Day efforts to increase consumption of fruits and vegetables for improved public health. The 5 A Day for Better Health program is the nation's largest public-private nutrition education initiative with 5 A Day coordinators in each state, territory and the military. To learn more, visit [www.pbhfoundation.org](http://www.pbhfoundation.org).*





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## References

- <sup>1</sup> AC Nielson Homescan© Custom Survey of 2597 U.S. Households, January 2005.
- <sup>2</sup> State of the Plate: Study on America's Consumption of Fruits and Vegetables, Produce for Better health Foundation, 2003.
- <sup>3</sup> U.S. Department of Health and Human Services and U.S. Department of Agriculture (2005). *Dietary Guidelines for Americans*, 2005. 6<sup>th</sup> edition. Washington, DC: U.S. Government Printing Office. (Available online at <http://www.health.gov/dietaryguidelines/dga2005/document/pdf/DGA2005.pdf>)
- <sup>4</sup> NPD Foodworld, National Eating Trends, 2005.
- <sup>5</sup> 5 A Day The Color Way Campaign: Specialty Crop Grant Results and Notable Highlights, Produce for Better health Foundation, 2005.

